

IN THE FEDERAL DISTRICT COURT, BALTIMORE MARYLAND

Erwin Boateng

v

United States

Case number (RDB-19-0032)



EMERGENCY MOTION TO EXPEDITE 3143 (RELEASE PENDING APPEAL) MOTION

COMES NOW, ERWIN BOATENG pro se, respectfully request that this Honorable Court grant Mr. Boateng's motion for release pending appeal for the following reasons;

1. Mr. Boateng is a United States Marine Corps War Veteran and a father of two currently serving a 42 month sentence at Cumberland Satellite Camp in Maryland.
2. Mr. Boateng's initial motion was filed with this Court on 28 March, 2022.
3. Mr. Boateng timely filed his notice of appeal with the Fourth Circuit Court of Appeals.
4. Mr. Boateng submits that his motion filed with this court as noted previously above is sufficient to compel this court to grant him his release pending the resolution of his appeal.
5. Mr. Boateng also submits that he qualifies for a bail pending resolution of his appeal as he meets the conditions of release under Section 3143.
6. Given that Mr. Boateng has no history of violence and has not received any disciplinary actions through his time at the federal prison Camp in Cumberland Maryland, and that his fiancé' recently delivered a baby girl, that this Court grant him his release on a timely if not expedited basis.

WHEREFOR ERWIN BOATENG, pro se respectfully request this court grant his motion for immediate bail pending resolution of his appeal.

RESPECTFULLY SUBMITTED

ERWIN BOATENG
64529-037

I CERTIFY THAT ON JUNE 6TH, 2022 I SENT A COPY OF THIS DOCUMENT BY FIRST CLASS MAIL POSTAGE PREPAID TO ALL PARTIES OF RECORD.

ERWIN BOATENG